

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Hearing Date: June 25, 2025 at 9:30 A.M. ET

Objection Deadline: June 11, 2025 at 4:00 P.M. ET

Ref. Nos. 30310 & 30336

**CERTIFICATION OF COUNSEL REGARDING FTX RECOVERY TRUST’S ONE
HUNDRED SEVENTY-SECOND (SUBSTANTIVE) OMNIBUS OBJECTION TO
CERTAIN NO LIABILITY PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to the FTX Recovery Trust,² hereby certify as follows to the best of my knowledge, information and belief:

1. On April 28, 2025, the FTX Recovery Trust filed the *FTX Recovery Trust’s One Hundred Seventy-Second (Substantive) Omnibus Objection to Certain No Liability Proofs of Claim* [D.I. 30310, redacted & 30336, sealed] (the “Objection”).

2. Pursuant to the Notice of Objection [D.I. 30310-1 & 30336-1], any responses to the Objection were to be filed no later than June 11, 2025, at 4:00 p.m. (ET) (the “Response Deadline”).

3. The FTX Recovery Trust received an informal response (the “Informal Response”) to the Objection from the holder of claim number 3950.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

4. On June 16, 2025, Elaine Baker (“Baker”) filed a late response to the Objection [D.I. 30854] (the “Baker Response”).

5. As of the Date hereof, no other responses to the Objection have been filed or served on the FTX Recovery Trust.

6. The FTX Recovery Trust has revised the proposed form of order (“Revised Order”), a copy of which is attached hereto as **Exhibit A**, to reflect the adjournment of the Objection solely with respect to claim number 3950 and the Baker Response. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as **Exhibit B**. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

7. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Revised Order at its earliest convenience.

Dated: June 26, 2025
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Christian P. Jensen (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
jensenc@sullcrom.com

Counsel for the FTX Recovery Trust